REMARKS

The Office Action of July 7, 2008 has been reviewed and the comments therein carefully considered. Claims 18 and 20-33 are pending in this application. Claims 18, 20-26, and 28-33 stand rejected under 35 U.S.C. §103(a) for obviousness over U.S. Patent. No. 6,552,661 to Lastinger et al. and further in view of U.S. Patent No. 6,617,962 to Horwitz et al. Claim 27 stands rejected under 35 U.S.C. §103(a) for obviousness over Lastinger et al. in view of Horwitz et al. and further in view of U.S. Patent No. 5,976,038 to Orenstein et al.

Claim 18 of the present application is directed to a localization system comprising a means for generating an energy field which is adapted to transmit pulse beams comprising nine pulse streams which are oriented substantially parallel to one another. Claim 31 is directed to a method for localizing objects or animals including the step of generating an energy field formed by one or more pulse beams, where each pulse beam comprises nine pulse streams oriented at least substantially parallel to each other. By dividing the pulse signal into a plurality of substantially parallel pulse streams, and particularly nine pulse streams, the pulse streams do not have to closely follow one another to increase the data transfer speed. This arrangement enhances the reliability of the system, allows for less expensive detention means to be used and eliminates the need for error correction systems. Contrary to the assertion in the Office Action, the unique features of Applicants' invention, and particularly the limitation that the pulse beams are split into nine pulse streams which are oriented at least substantially parallel to one another, is not taught or suggested in the cited art.

The Office Action contends that Lastinger et al. is directed to a zone-based identification system that uses radio frequencies to determine whether a specific object is located within a certain zone. The system includes a receiver and a plurality of identification devices which are attached to different objects within the system. The Office Action admits that Lastinger et al. does not teach or suggest using pulse beams having nine pulse streams oriented substantially parallel to one another. The Office Action then cites to Horwitz et al. as teaching a system for multi-standard RFID tags wherein at least two pulse streams of a

pulse beam are oriented at least substantially parallel to each other to provide multi-frequency capability for the reader. While neither Lastinger et al. nor Horwitz et al. expressly discloses the use of nine pulse streams located substantially parallel to one another, the Office Action concludes this would be obvious since it amounts to nothing more than the combination of familiar elements according to known methods to yield predictable results.

Applicants, however, disagree with the scope and interpretation provided to the Horwitz et al. document. As previously mentioned, the Office Action contends that Horwitz et al. discloses multiple pulse streams oriented substantially parallel to one another. As support for this, the Office Action cites Horwitz et al. at column 6, lines 52-61. While it is correct that Horwitz et al. uses the term "parallel" in line 60, characterizing this discussion as teaching substantially parallel pulse streams originating from a pulse beam is not correct. Instead, this section of Horwitz et al., as well as the use of the term "parallel", describes the way in which the radio frequency modules (12, 14, 16, and 18) are interconnected within the electric circuit layout shown in Fig. 1. In this layout, the frequency modules are coupled in parallel to the interrogator control module (11) via bus (19). This arrangement enables the multi-frequency capability for the reader (10), but it does not provide for the parallel transmission of signals. Instead, the signals can be transmitted either superposed or sequentially in time. Accordingly, Horwitz et al. does not discuss suggest the transmission of parallel signals.

Orenstein et al. is cited as teaching a disruption means that is formed by a coating. Orenstein et al. is not discussed with respect to parallel pulse streams and thus fails to cure the deficiencies discussed above with respect to the combination of Lastinger et al. and Horwitz et al.

For all of the foregoing reasons, Applicants submit that pending claims 18 and 20-33 are patentable over the cited documents and are in condition for allowance.

Accordingly, reconsideration of the rejections and allowance of pending claims 18 and 20-33 are respectfully requested.

Respectfully submitted,

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